

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	Case No.: 3:23-cv-00733
)	
v.)	Judge: JAMES R. KNEPP II
)	
\$50,000.00 IN U.S. CURRENCY,)	
)	
Defendant,)	
)	
and)	
)	
TYRONE HAMILTON)	
and)	
JENNIFER FROST,)	
)	
Claimants.)	

VERIFIED CLAIM

All of the averments and statements set forth below in support of this Claim are made under oath, subject to the penalty of perjury.

I, Tyrone Hamilton, 21050 Kittridge, No. 426, Canoga Park, California 91303, do hereby identify myself as, not only being the owner, but as the person who was in possession of the items centralized, herein, to wit U.S. Currency in an amount of approximately \$50,000.00 that was seized from me in Toledo, Ohio, on November 14, 2022. Indeed, the named Defendant U.S. Currency in the United States District Court for the Northern District of Ohio, Case No. 3:23-cv-00733-JRK is \$50,000.00, which is less than the amount actually seized. To the extent necessary, and without waiving any claims I may have to the unnamed seized Currency or other jurisdictional issues, I, Tyrone Hamilton, do hereby identify myself as, not only being the owner, but as the person who was in possession of the Defendant \$50,000.00 in U.S. Currency.

In addition, and to be sure, I was in possession of these monies when they were seized in violation of my Fourth Amendment rights. Indeed, the officers lacked probable cause to seize my money and did violate my constitutional rights in so doing. The officers likewise lacked any basis for a belief these items were “evidence of a crime or contraband” when the seizure occurred. See *Soldal v. Cook County, IL*, 506 U.S. 56, 68 (1992). Yet, these unlawful acts were consummated by law enforcement officers trained and employed under the State of Ohio. These seizures further occurred in the wake of a traffic stop, the nature of which we deem to be illegal.

So postured, it follows (as I have been advised), that any seizure of the monies from me must be deemed to have been unlawful. For sure, this seizure was in violation of my rights. Clearly then, since the items centralized in this matter were in my possession when taken and given the burden of proof necessary to justify the belief that these items were contraband when seized, it seems clear that there is no way the Government can prevail in any forfeiture action despite **Civil Asset Forfeiture Reform Act of 2000 (CAFRA)**.

THEREFORE, I declare that, as the Claimant, herein, I hereby demand that the Government return my property to me, indeed, on a forthwith basis.

STATE OF CALIFORNIA }
 } ss: AFFIDAVIT
COUNTY OF LOS ANGELES }

I attest and declare under penalty of perjury that my Claim is **not** frivolous, and the information provided in support of my Claim is true and correct to the best of my knowledge and belief.



TYRONE HAMILTON

SUBSCRIBED AND SWORN IN MY PRESENCE, a Notary Public, this 15 day of
May, 2023.



NOTARY PUBLIC

My Commission Expires: FEBRUARY 10-2027

